

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

TREMAR HARRIS,

Plaintiff,

v.

OFFICER WILLIAM RENTZ, individually,
OFFICER JOHN DOE 1-3, individually,

Defendants.

Civil Action No.
2:24-CV-9

**PLAINTIFF'S RESPONSES TO DEFENDANT WILLIAM RENTZ'S FIRST REQUEST
FOR INTERROGATORIES**

NOW COMES, Plaintiff, Tremar Harris, by and through undersigned counsel, and hereby responds to Defendant William Rentz (hereinafter “Defendant Rentz”) for Interrogatories to the Plaintiff as follows:

INTERROGATORIES

1. Please state your full name, including aliases, and permanent address.

Response: Full Name: Tremar Alonzo Harris; Permanent Address: Mr. Harris doesn't have a permanent address. He is currently incarcerated at Appling ITF located at 252 West Park Drive, Baxley, GA 31513.

2. Please list your employment history for the past fifteen (15) years. For each job, please include the name and business address of the employer, the dates during which you were employed, your job title, your duties and responsibilities, and your reason(s) for leaving.

Response: Plaintiff has worked odd jobs over the course of 15 years. Plaintiff was employed

at Woody Folsom Automotive, Inc. located at 1749 Golden Isles W, Baxley, GA 31513. Plaintiff cannot remember dates of employment but remember starting in 2017.

3. Please list every time you have been arrested and for each arrest, please provide the date and place of the arrest, a description of the arrest, whether the arrest resulted in a conviction, and the sentence resulting from the conviction.

Response: Plaintiff cannot recall conviction status of all arrest; however Plaintiff has been arrested as follows:

1. January 14, 2004 – Possession of Marijuana & Defective equipment in Baxley, GA.
2. September 8, 2004 – Probation Violation in Baxley, GA.
3. August 18, 2005 – Loud Music, Possession of Marijuana, & No Driver's License in Baxley, GA.
4. June 21, 2008 – Pedestrian Under the Influence in Baxley, GA.
5. November 8, 2008 – Obstruction and disorderly conduct in Baxley, GA.
6. August 8, 2011 – Probation violation in Baxley, GA.
7. Dec. 15, 2011 – Loud music & driving with suspended license in Baxley, GA.
8. July 19, 2015 – Criminal damage to property in the second degree in Baxley, GA.
9. May 30, 2015 – Failure to Appear in Baxley, GA.
10. September 22, 2015 – Burglary in Baxley, GA.
11. October 25, 2015 – Disorderly conduct & Interference with government property in Baxley, GA.
12. December 25, 2015 - Disorderly conduct, Interference with government property, and probation violation in Baxley, GA.
13. March 29, 2017 – Driving with suspended license in Baxley, GA.

14. March 11, 2022 – Disorderly conduct in Baxley, GA.
15. January 10, 2022 – Theft by taking in Baxley, GA.
16. January 27, 2022 – Possession of drug related objects in Baxley, GA.
17. February 4, 2022 – Disorderly conduct in Baxley, GA.
18. March 2023 – Obstruction of an officer & Entering an automobile with criminal attempt to commit a felony.

4. Please identify every jail, detention center, or other like facility that you have been held in between January 1, 2022, and the present. For each such facility, please state the dates of your detainment at the facility.

Response: Appling County jail – Plaintiff cannot recall all time periods at this facility, Jeff Davis Detention Center from August 2022 – January 2024, Appling ITF from January 2024-Present

5. State the names and addresses or information sufficient to locate every person known, or reasonably believed by you, to have been an eyewitness to the incident(s) complained of in this case or to have knowledge of the incident described in the Complaint.

Response: Plaintiff believes Cannon McLeod, Daydan Brannon, Ansley Fennell, John McCullough, and Jurran Gonzalez witnessed and/or have knowledge of the incident described in the Complaint. All above named individuals are represented by counsel , Richard K. Strickland, located at 5 Glynn Ave. Brunswick, GA 3152.

6. Please identify all documents that are related to the incident complained of in your Complaint or support your claim that Defendant Rentz violated your constitutional rights.

Response: Video Rentz 49 –video of the incident on Jan. 29, 2022; Video Rentz 51 – Ashley

Fennell's interview regarding the incident; Video Rentz 54 – Cannon McLeod's interview regarding the incident; Video Rentz 53 – Jurran Gonzalez's interview regarding the incident. Additionally, Statements from Cannon McLeod (Def. Rentz 000020-000022), Captain Bell (Def. Rentz 000023), Amber Brown (Def. Rentz 000032-000034), Ansley Fennell (Def. Rentz 000035-000036), and Jurran Gonzalez (Def. Rentz 000039-000041). Plaintiff wrote an inmate grievance (Def. Rentz 000024) and Investigator Evan investigative notes from video review off the incident (Def. Rentz 000028).

7. Have you or any other person acting on your behalf obtained any statement or report (whether oral, written, or recorded) from any person with knowledge or information relevant to the facts or circumstances of this lawsuit? If so, please state the name and address of the person making the statement or report, the form of the statement or report (i.e., oral, written, recorded, etc.), and the date the statement was obtained or made.

Response: Plaintiff have not obtained any statements.

8. State the name, address, telephone number and educational or occupational expertise of each person who, to your knowledge, information or belief:

- a) You expect to call as an expert witness at trial, and for each expert, state the substance of the facts and opinions to which he or she is expected to testify and a summary of the grounds for each opinion;
- b) You have retained or specially employed as an expert in anticipation of litigation or preparation for trial and whom you do not expect to call as a witness at trial.
- c) Please identify all learned treatises, studies, books, articles and other writings which is/are considered standard and authoritative by any individual who will

testify as an expert witness on Plaintiff's behalf at the trial of this case.

Response: There is no expert witness at this time; Plaintiff reserves the right to supplement.

9. Identify with specificity any physical or emotional injuries that you contend are attributable to Defendant Rentz.

Response: Plaintiff was frightened, shocked, and unable to breath due to being strangled.

Plaintiff neck was sore after the metal leg cuffs were pulled around his neck. Plaintiff still suffers from PTSD from the incident.

10. For each such injury identified in response to Interrogatory No. 9, please list by name and address every facility, treating physician, or medical provider you have seen for treatment of the injury.

Response: Plaintiff did not seek medical treatment.

11. Itemize with specificity all damages that Plaintiff contends he is entitled to recover against Defendant Rentz and the measure by which any damages recoverable should be computed, including the total sum of special damages claimed at this time.

Response: Discovery is ongoing; Plaintiff reserves the right to supplement response.

12. Identify all social media platforms which you use or have used in the last three (3) years and provide your username or screen name for each social media platform used.

Response: Plaintiff has Facebook with the username Tramar Harris.

13. For each time you or any representative communicated with Defendant Rentz,

before or after the date in question, January 29, 2022, please state the date such communication was made, who was engaged in such communication, and the details of that communication.

Response: Plaintiff does not recall any communication with Defendant Rentz before or after January 29, 2022; Plaintiff reserves the right to supplement response.

14. Have you ever filed any other suit for damages for any personal injury or had someone file a suit for damages against you? If so, please give the details of each suit.

Response: Plaintiff doesn't recall suing anyone or being sued; Plaintiff reserves the right to supplement response.

15. Please state whether you consumed any prescription or non-prescription drugs or medications on the date in question, January 29, 2022. If so, please state the specific medication or drug, the amount consumed, and the time(s) consumed.

Response: Plaintiff was incarcerated on January 29, 2022 and did not have access to nor consumed non-prescription medicine/drugs. Plaintiff does not recall if he was given prescription medicine/ drugs on January 29th; Plaintiff reserves the right to supplement response.

16. Please list every facility, treating physician, or medical provider you have been to in the past ten (10) years for mental health treatment or rehabilitation, including any treatment or rehabilitation for addiction or substance abuse, whether inpatient or outpatient.

Response: Plaintiff sought treatment for mental health at Georgia Regional – Savannah . Plaintiff is unable to recall specific dates of treatment; Plaintiff reserves the right to supplement response.

17. Defendant Rentz is entitled to request and receive your medical and/or mental health records because you have put your medical condition in question in this lawsuit. Please state whether you will execute a Consent for Release of Medical Information Form. If you refuse to execute the Consent Form, state with specificity the grounds for your refusal.

Response: Plaintiff will consent to execute a Release of Medical Information Form.

Submitted this 10th day of May, 2024.

/s/ M. Waite Thomas
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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon all parties in this case by Statutory Electronic Service and via e-mail.

Submitted this 10th day of May, 2024.

/s/ M. Waite Thomas
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